

SOUTHERN ENVIRONMENTAL LAW CENTER

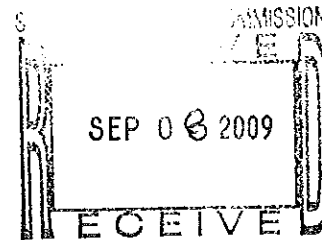
Telephone 919-967-1450

200 WEST FRANKLIN STREET, SUITE 330
CHAPEL HILL, NC 27516-2559

Facsimile 919-929-9421

September 2, 2009

Mr. Charles L.A. Terreni
Chief Clerk of the Commission
SC Public Service Commission
P.O. Drawer 11649
Columbia, SC 29211



VIA U.S. MAIL

RE: South Carolina Electric & Gas Company's Request for Approval of Demand Side Management Plan Including a Demand Side Management Rate Rider and Portfolio of Energy Efficiency Programs
Docket No. 2009-261-E

Dear Mr. Terreni:

Please find enclosed for filing in the above-referenced docket the original and two copies of a Motion for Admission Pro Hac Vice and Verified Application of Jill Mara Tauber. Please date-stamp the extra copy and return it to me in the stamped, self-addressed envelope enclosed for your convenience. By copy of this letter I am serving a copy of the same on all parties of record. If you have questions, please do not hesitate to contact me.

Sincerely,

Kate Double
Legal Assistant

Enclosures

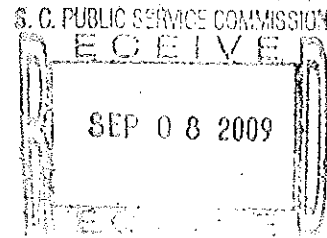
Cc (w/encl.): Parties of Record

218959

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2009-261-E



In the Matter of:)
)
South Carolina Electric & Gas Company's)
Request for Approval of Demand Side)
Management Plan Including a Demand)
Side Management Rate Rider and Portfolio)
of Energy Efficiency Programs)

MOTION FOR ADMISSION
PRO HAC VICE

Petitioners the South Carolina Coastal Conservation League and the Southern Environmental Law Center ("Petitioners") hereby move the South Carolina Public Service Commission ("Commission") to permit Jill Mara Tauber to practice *pro hac vice* before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Tauber, with the consent of counsel of record, is simultaneously filing with the South Carolina Supreme Court a copy of the Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, Petitioners respectfully request that this motion be granted.

This 2nd day of August, 2009.

J. Blanding Holman (KD)
J. Blanding Holman, IV
Southern Environmental Law Center
38 Broad Street, Suite 200
Charleston, SC 29401
Telephone: (843) 720-5270
Fax: (843) 720-5240

CERTIFICATE OF SERVICE

I hereby certify that the following persons have been served with the Motion for Admission Pro Hac Vice and Verified Application for Admission Pro Hac Vice of Jill Mara Tauber via electronic mail:

Lee E. Dixon , Counsel
Pope Zeigler, LLC
Post Office Box 11509
Columbia, SC, 29211

E. Wade Mullins, III , Counsel
Bruner Powell Robbins Wall & Mullins,
LLC
Post Office Box 61110
Columbia, SC, 29260

Joey R. Floyd, Counsel
Bruner, Powell, Robbins, Wall & Mullins,
LLC
Post Office Box 61110
Columbia, SC, 29260

Frank Knapp, Jr.
1717 Gervais Street
Columbia, SC, 29201

Shannon B. Hudson, Counsels
Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC, 29201

Belton T. Zeigler , Counsel
Pope Zeigler, LLC
Post Office Box 11509
Columbia, SC, 29211

Catherine D. Taylor , Senior Counsel
South Carolina Electric & Gas Company
1426 Main Street, M/C 130
Columbia, SC, 29201


K. Chad Burgess , Senior Counsel
South Carolina Electric & Gas Company
1426 Main Street, MC 130
Columbia, SC, 29201

Robert Guild
314 Pall Mall
Columbia, SC 29211

Scott Elliott
Elliott & Elliott
721 Olive Street
Columbia, SC 29205

Mitchell Willoughby
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC 28211

This day of 2nd day of September, 2009


Kate Double
Administrative Legal Assistant

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA**

South Carolina Electric & Gas Company's
Request for Approval of Demand Side
Management Plan Including a Demand
Side Management Rate Rider and Portfolio
of Energy Efficiency Programs

Plaintiff

DOCKET NO. 2009-261-E

Case No.

Public Service Commission of
South Carolina

Court

vs.

Mailing Address of Court: 101 Executive Center Dr., Suite 100
Columbia, SC 29210

Defendant

Comes now Jill Mara Tauber, applicant herein, and respectfully represents the following:

1. Applicant resides at:

105-R Jones Ferry Rd.

Street Address

Carrboro

Orange

NC

27510

City

County

State

Zip Code

917-533-6843

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Southern

Environmental Law Center, with offices at, at

200 West Franklin Street, Suite 330

Street Address

Chapel Hill

Orange

NC

27516

City

County

State

Zip Code

919-967-1450

Telephone

919-929-9421

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by the South Carolina Coastal Conservation League and the Southern Environmental Law Center to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since October of 2006, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of New York (please see attachment) ~~where applicant regularly practices law~~. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

New York state courts	October 25, 2006
District of Columbia courts (DC Superior Court and Court of Appeals)	June 11, 2007
U.S. District Court for the Eastern District of Louisiana (admitted pro hac vice for one case)	June 25, 2007

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

U.S. District Court for the Eastern District of Louisiana (withdrew as counsel in case due to job change)

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

n/a

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

n/a

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

n/a

9. Local counsel of record associated with applicant in this case is J. Blanding Holman IV, of the Southern Environmental Law Center law firm, which has offices at:

38 Broad Street, Suite 200

Street Address

Charleston

Charleston

SC

29401-3042

County

City

State

Zip Code

843-720-5270

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

n/a

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

Environmental Defense Fund et al. v. South Carolina Department of Health and Environmental Control, Docket No. 09-ALJ-07-0166-CC: This case is pending before the South Carolina Administrative Law Court. My application for pro hac vice admission was submitted on May 4, 2009 and was granted on May 20, 2009. The local counsel of record in this case is J. Blanding Holman IV.

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 2nd day of September, 2009.

Jill Mara Tauber
APPLICANT

VERIFICATION

STATE OF North Carolina)

COUNTY OF Orange)

I, Jill Mara Tauber, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 2nd day of September, 2009.

[Signature]
Lou Ann Phelps
Notary Public for the State of North Carolina

LOU ANN PHELPS
Notary Public, North Carolina
Durham County
My Commission Expires
October 25, 2011

My Commission Expires: October 25, 2011

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 2nd day of September, 2009.

[Signature] (RD)
LOCAL COUNSEL OF RECORD

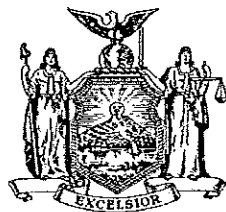
CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 2nd day of September, 2009.

[Signature]
APPLICANT/AFFIANT

Attachment to Paragraph 4, Verified Application for Admission *Pro Hac Vice*

Applicant provides this attachment to explain why she crossed out "where applicant regularly practices law" in paragraph 4 of the verified application for admission *pro hac vice* in the state of South Carolina. Applicant is admitted and authorized to practice law in the highest court of New York and the District of Columbia, but applicant does not currently regularly practice law in these jurisdictions. Applicant currently works in North Carolina under the direction and active supervision of licensed North Carolina attorneys. On March 17, 2009, the applicant spoke to Mr. Sam Miller at the South Carolina Office of Bar Admissions concerning her *pro hac vice* application in another matter before the South Carolina Administrative Law Court (which was granted on May 20, 2009). On the call, the applicant confirmed that she is eligible to be admitted *pro hac vice* in South Carolina because applicant is an active member of the bars of New York and DC, and will be associated in the South Carolina proceeding with the local counsel of record, pursuant to Rule 404, SCACR. Mr. Miller directed applicant to cross out the phrase "where applicant regularly practices law" in paragraph 4.



**Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department**

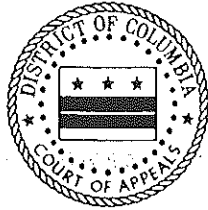
I, James Edward Pelzer, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Jill Mara Tauber** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the **25 th** day of **October 2006**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on August 18, 2009.



James Edward Pelzer

Clerk of the Court



District of Columbia Court of Appeals

Committee on Admissions

430 F Street, N.W. — Room 123

Washington, D. C. 20001

202/879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JILL M. TAUBER

was on the 11TH day of JUNE, 2007

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 27, 2009.

GARLAND PINKSTON, JR., CLERK

By: M. Charles
Deputy Clerk